

# EXHIBIT G

UNITED STATES DISTRICT COURT, DISTRICT OF MONTANA  
GREAT FALLS DIVISION

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MICHELLE KING, as the Personal  
Representative of the Estate of  
ROBERT GLENN KING,

Cause No. CV 23-47-BLG-SPW

Plaintiff,

vs.

UNITED TEACHER ASSOCIATES  
INSURANCE COMPANY,  
CONTINENTAL GENERAL  
INSURANCE COMPANY, GREAT  
AMERICAN LIFE INSURANCE  
COMPANY, CONTINENTAL LTC,  
INC., fka CONTINENTAL  
INSURANCE, INC., and DOES 1-V,

Defendants.

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VIDEOTAPED 30(B)(6) DEPOSITION OF  
CONTINENTAL GENERAL INSURANCE COMPANY

JULIE BELKNAP

Taken from:

Nordhagen Court Reporting  
1734 Harrison Avenue  
Butte, Montana  
September 11, 2024  
8:00 a.m.

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15 FOR THE DEFENDANTS UNITED TEACHER ASSOCIATES INSURANCE  
16 COMPANY, CONTINENTAL GENERAL INSURANCE COMPANY,  
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Page 3

1 APPEARANCES OF COUNSEL (via Zoom)(Continued):

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11  
12  
13  
14  
15  
16  
17  
18 Also Present:

19 Josy McLean, Bidegaray Law Firm

20  
21 John Nordhagen, Videographer

22 Nordhagen Court Reporting

I N D E X

Witness:

Page:

JULIE BELKNAP

Examination by Mr. Abourazek . . . 9

E X H I B I T S

NO.	PAGE	DESCRIPTION
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A	16	Defendants' Objections/Responses To Plaintiffs' First and Second Set of Requests For Production of Documents
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Page 5

1 VIDEOTAPED 30(B)(6) DEPOSITION OF CGIC

2 JULIE BELKNAP

3 WEDNESDAY, SEPTEMBER 11, 2024

4 - - -

5 BE IT REMEMBERED THAT, pursuant to Notice, the  
6 Videotaped 30(b)(6) Deposition of Continental General  
7 Insurance Company, Julie Belknap, was taken at the  
8 time and place and with the appearances of counsel  
9 hereinbefore noted before Candice L. Nordhagen, Court  
10 Reporter - Notary Public for the State of Montana.

11 It was further stipulated and agreed by and  
12 between counsel for the respective parties that this  
13 deposition was taken pursuant to the Federal Rules of  
14 Civil Procedure.

15  
16 The following proceedings were had:

17  
18 VIDEOGRAPHER: The time is 8:01 a.m. We  
19 are on the record.

20 This is the Videoconference,  
21 Video-Recorded 30(b)(6) CGIC Deposition of Julie  
22 Belknap, taken by the attorneys for the Plaintiff, in  
23 the matter of Michelle King, as the Personal  
24 Representative of the Estate of Robert Glenn King,  
25 Plaintiff v. United Teacher Associates Insurance

Page 6

1 Company, et al., Defendants.

2 This is Cause No. CV-21-87-BMM, in the  
3 United States District Court, District of Montana,  
4 Great Falls Division.

5 This deposition is being taken on Friday,  
6 the 13th day of September - I think that date's wrong  
7 - the 11th day of September, 2024, from Nordhagen  
8 Court Reporting, 1734 Harrison Avenue, in Butte,  
9 Montana.

10 The videographer is John Nordhagen.

11 The court reporter is Candi Nordhagen.

12 Counsel will now introduce themselves, and  
13 those off camera, after which the court reporter will  
14 swear in the witness.

15 MR. DAVIS: Dan and Mike, you guys go  
16 first.

17 MR. ABOUREZK: Mike Abourezk for the  
18 Plaintiff Michelle King.

19 MS. JONES: Oh, Dan, you're on mute, I  
20 believe.

21 MR. BIDEGARAY: Sorry, yeah. And Dan  
22 Bidegaray, with Mike Abourezk, for Michelle King.

23 MS. JONES: I am Sandra Jones, from Faegre  
24 Drinker Biddle & Reath. I am on behalf of, I'm going  
25 to call them the "Continental Insurance defendants,"

1 but Continental General Insurance Company; Continental  
2 LTC, INC.; and United Teacher Associates.

3 My co-counsel is Jessica Gallagher, who's  
4 here for observational purposes.

5 I also have my Montana counsel, who can  
6 introduce themselves momentarily.

7 MR. DAVIS: Nicole, you go next.

8 MS. WIXTED: Nicole Wixted, also from  
9 Faegre Drinker Biddle & Reath, on behalf of one of the  
10 other defendants, Great American Life Insurance  
11 Company, now known as MassMutual Ascend Life Insurance  
12 Company.

13 MR. DAVIS: Max Davis, in Great Falls,  
14 likewise for the Continental and Great American  
15 Defendants.

16 MR. CONROY: And Devon Conroy, also in  
17 Great Falls, for the Continental and Great American  
18 Defendants.

19  
20 JULIE BELKNAP,  
21 having been called as a witness by the  
22 Plaintiff, being first duly sworn, was  
23 examined and testified as follows:  
24

25 MR. ABOUREZK: I've got a little issue

1 here. Is Dan missing from the linkup right now? Dan,  
2 there you are.

3 Who is the host of this? Who is hosting  
4 this.

5 VIDEOGRAPHER: We are, Nordhagen Court  
6 Reporting.

7 MR. ABOUREZK: Okay. Can you switch it so  
8 that I can share documents on share screen?

9 VIDEOGRAPHER: Oh, yeah, you can. You can  
10 share. It's open to share.

11 MR. ABOUREZK: Oh, okay. Thank you.

12 VIDEOGRAPHER: You bet.

13  
14 EXAMINATION

15 BY MR. ABOUREZK:

16 Q. Tell me your name, please.

17 A. Julie Belknap.

18 Q. And what's your position with Continental?

19 A. I'm the assistant COO, and I serve as the  
20 VP which leads the strategic operations team.

21 Q. Okay. I'm going to have a hard time  
22 hearing you. There's quite an echo going on where  
23 you're at.

24 A. Okay.

25 Q. Do you know where the microphone's at?

1 Can you get a little closer to it in some way?

2 A. I have a microphone right here.

3 Q. Yeah, that way we can --

4 A. Is this any better?

5 Q. That, that will help. You're in a big  
6 room and there's quite an echo.

7 Have you seen the deposition notice that was  
8 issued for this deposition today?

9 A. I have.

10 Q. And I'm going to share that with you, I  
11 hope. Do you see it?

12 A. I see that, yes.

13 Q. Is it big enough? Do you recognize it? I  
14 have no idea how big it is on your screen so you need  
15 to help me out a little bit.

16 A. I can see the document. If we need to be  
17 able to see text or anything substantial in it, I  
18 would need to zoom in a little bit.

19 Q. Okay. But you have seen what I've marked  
20 here as Exhibit 1 to the 30(b)(6) deposition?

21 A. Yes.

22 Q. The first page, and here's the second  
23 page. You have seen this, correct?

24 A. Correct.

25 Q. And do you understand that pursuant to

1 this, the company was obligated to designate someone  
2 that is knowledgeable about these two subjects that  
3 are listed here so that we could take testimony and  
4 ask questions? Do you understand that?

5 A. Yes.

6 Q. And do you understand that the questions  
7 and answers -- or the answers you're giving today are  
8 on behalf of Continental Insurance Company?

9 A. Yes.

10 Q. Okay. Did you do anything to familiarize  
11 yourself with these two subjects that are listed?

12 The first subject is the efforts made by  
13 Continental to respond to Plaintiff's interrogatories  
14 and document requests, the searches conducted and the  
15 results.

16 Did you do anything to familiarize yourself with  
17 that subject matter?

18 A. Yes.

19 Q. Can you tell me what you did?

20 A. I reviewed the interrogatories and the  
21 document requests, and I spoke with my attorneys.

22 Q. And when you say "my attorney," who is  
23 that? Who are you referring to?

24 A. Sandy and Jessica.

25 Q. Okay. And are you familiar with the

1 **search capability of OnBase?**

2 A. Yes.

3 **Q. Can you tell me, what is OnBase?**

4 A. OnBase is an enterprise system that we use  
5 that's essentially a document repository system so it  
6 houses all of the documents associated with policies  
7 or policy forms for everything that we do on our  
8 systems.

9 **Q. And as I understand it, your claim file**  
10 **system is in OnBase; is that correct?**

11 A. So our documents associated with claims  
12 are in OnBase. And then we have an administration  
13 system called "LifePRO," and that's where we would  
14 process any types of payments that happen as a result  
15 of any claim.

16 **Q. But you have claim files, correct? You**  
17 **have a file that's associated each time a claim is**  
18 **filed; is that correct?**

19 A. Correct. And that document is within the  
20 OnBase system.

21 **Q. And you can perform full-text searches in**  
22 **the OnBase system; is that correct?**

23 A. No, we're not able to perform full  
24 searches. So every document within OnBase has a  
25 specific and associated document type within it. And

1 then within each document type, there's index values  
2 for -- called "keywords." And we can search keywords  
3 and we can search the document types, but we can't  
4 search any of the actual content within the document.

5 Q. Well, do you have some special form of  
6 OnBase that's different from the Hyland OnBase that  
7 they sell commercially?

8 MS. JONES: I'm going to object to the  
9 form of the question.

10 But you can answer, Julie, if you  
11 understand.

12 THE WITNESS: I am not an OnBase Hyland  
13 expert but I'm familiar with the OnBase capabilities  
14 that we have to us at Continental General.

15 Q. (By Mr. Abourezk) And you're claiming that  
16 the OnBase system that you have, you cannot perform  
17 word searches --

18 MS. JONES: Objection to the --

19 Q. -- within the text of documents?

20 MS. JONES: I'm going to object to form.  
21 Julie, you can answer.

22 MS. WIXTED: I'm joining in that  
23 objection.

24 THE WITNESS: So I can open a document. I  
25 can search across the system for certain types of

1 documents, and then I would need to open the document  
2 itself and see if that document was searchable. Some  
3 of the documents that we have are pictures,  
4 essentially, of documents. And so if I have a  
5 handwritten text or a picture of a Word document, that  
6 wouldn't be searchable.

7 Q. Oh, so what you're saying is image files,  
8 you can't search. Is that what you're saying?

9 A. Within that, OnBase has a variety of  
10 document types so there could be some Word documents.  
11 If I'm in that particular Word document and where I  
12 have that one document pulled up, I would be able to  
13 search within that one particular document but I can't  
14 globally across a series of documents, globally search  
15 those.

16 Say if there were ten documents, I couldn't say,  
17 "Search all ten documents for a particular word." I  
18 wouldn't be able to do that. And I cannot search  
19 images because it can't do a word search on that.

20 Q. Okay. But what you're saying is, I'm just  
21 going to break this down, when you say a "Word  
22 document," you're talking about a Word document that  
23 is in the program Word?

24 A. It could be.

25 Q. Is that what you mean?

1 A. It could be. So some of the documents  
2 will open up as another window that could be Word if  
3 it was something like that.

4 Q. So if it's claim notes, for instance,  
5 claim notes are something that are created inside the  
6 company, right? That's not an image file, correct?

7 A. Correct.

8 MS. JONES: Object to form.

9 Go ahead, Julie, go ahead.

10 THE WITNESS: Correct, correct.

11 Q. (By Mr. Abourezk) And so claim notes are  
12 something that would be searchable by a word search,  
13 right?

14 A. Again, on that one, it is searchable  
15 within a given policy. So I can open up the claim  
16 notes doc type and I can search within that for my one  
17 policy, but I can't search across multiple policies at  
18 the same time.

19 Q. But you could search within one claim  
20 file, correct?

21 A. Yes.

22 Q. And you could do a word search in that one  
23 claim file, correct?

24 A. Yes.

25 Q. And so long as the document is not just an

1 image file, in other words, it's not just a picture,  
2 it's a word processing document such as claim notes,  
3 then you can search those, correct?

4 A. Yes; so one policy at a time but, yes.

5 Q. And where do you get the information that  
6 it's only one policy at a time in the OnBase system?  
7 Where did you get that information?

8 MS. JONES: Object to form of the  
9 question.

10 But, Julie, you can answer if you  
11 understand.

12 MS. JONES: I join in that objection.

13 THE WITNESS: Could you repeat your  
14 question again?

15 Q. (By Mr. Abourezk) Where did you get the  
16 information that you can only search one policy or one  
17 claim file at a time in the OnBase system?

18 A. I've worked with OnBase to know its  
19 capabilities on that side of it.

20 Q. Okay. Let's look at Exhibit A. And I'm  
21 going to switch this over to Exhibit A to this  
22 deposition.

23 (Document marked Deposition

24 Exhibit A displayed on the screen.)

25 BY MR. ABOUREZK:

1 Q. Did you review this before you came to  
2 testify today?

3 MS. JONES: Mike, nothing is up on the  
4 screen yet.

5 Q. (By Mr. Abourezk) Do you have it?

6 MS. JONES: It is now up. It looks to be  
7 a 79-page document. So, Julie, if you want to scroll  
8 through, you can ask Mike to scroll through.

9 THE WITNESS: Can you also zoom in a  
10 little bit?

11 Q. (By Mr. Abourezk) You want to zoom in, did  
12 you say?

13 A. Yes, please.

14 Q. (Complying.)

15 A. That's perfect, thank you.

16 Q. Okay. And you recognize these because you  
17 reviewed these, correct?

18 A. Yes.

19 Q. And is that big enough for you to read it  
20 okay?

21 A. If you could scroll just a little bit more  
22 to zoom in, that would be helpful.

23 Q. (Complying.)

24 A. That's great, thanks.

25 Q. Okay. This Request 8 asks for any

1 documents on any hard drive, server, or electronic  
2 storage media containing the words "Alternate Payment  
3 Benefit Rider" or "Alternative Payment Benefit Rider."

4 Do you see that?

5 A. Yes.

6 Q. Were you involved in trying to search for  
7 documents with those words?

8 A. I am aware of the request but I don't have  
9 access to be able to search that level of information.

10 Q. Well, were you involved in the search  
11 efforts?

12 MS. JONES: Objection to form.

13 Q. (By Mr. Abourezk) Were you involved in the  
14 search efforts?

15 A. Only in that I was aware of them.

16 Q. Well, are you aware of whether somebody  
17 tried to search for the words "Alternate Payment  
18 Benefit Rider"?

19 A. Yes.

20 MS. JONES: Object to form.

21 But go ahead, Julie.

22 MS. WIXTED: And I join.

23 THE WITNESS: Yes.

24 Q. (By Mr. Abourezk) And what happened?

25 A. We did not have any responsive documents.

1 Q. Are you saying that in all the claim files  
2 that you have and all the claim notes, the thousands  
3 of claim files, not once is it mentioned the words  
4 "Alternate Payment Benefit Rider"?

5 MS. WIXTED: Objection to form.

6 MS. JONES: Same objection.

7 Julie, you can try and answer.

8 THE WITNESS: Based on the information  
9 that was provided, we did not have any responsive  
10 documents to that request.

11 Q. (By Mr. Abourezk) Well, did you actually  
12 plug a search, a word search, into even one claim file  
13 to see if it contained those words?

14 MS. JONES: Objection.

15 MS. WIXTED: Objection to form.

16 MS. JONES: Julie, you can answer.

17 Although, you know, Mike, you and I  
18 discussed this at length. And I told you that we were  
19 not going to search individual claim files for search  
20 terms.

21 This was a search of our, if you -- you  
22 and I discussed this specifically, that you were  
23 looking for servers or electronic storage media; you  
24 were not looking for individual claim files. And so  
25 we did not search those. That would, that would

1 entail us searching thousands of claims files  
2 individually, and I told you that was not being done,  
3 so I'm not sure where the confusion lies.

4 MR. ABOUREZK: Well, we had later  
5 conversations. And when I said we didn't expect you  
6 to search individual claim files, that was for the  
7 original search.

8 Then you came out and narrowed it down and  
9 said, "Well, we've identified, we have 111 files where  
10 payments have been made," and we issued new requests  
11 then. And I did not limit that to -- I didn't say  
12 we're not going to agree -- or we agree that you don't  
13 have to look in individual claim files.

14 At any rate, I'm going to keep going with  
15 the question.

16 Did you, did you -- did we get an answer  
17 to this question? I'm asking that to the court  
18 reporter.

19 COURT REPORTER: No, we did not have an  
20 answer yet.

21 MR. ABOUREZK: Okay. Could you read the  
22 question back, please?

23 (The record was read by the court reporter  
24 as follows:

25 "QUESTION: Well, did you actually plug a

1 search, a word search, into even one claim file to see  
2 if it contained those words?")

3 MS. JONES: I'm going to lodge an  
4 objection to the form of that question.

5 But, Julie, you can answer.

6 MS. WIXTED: Same objection.

7 THE WITNESS: I did not do a particular  
8 search for those specific words on a particular  
9 policy.

10 Q. (By Mr. Abourezk) Well, do you know if  
11 anybody did a search for those particular words?

12 A. I am not aware.

13 Q. Well, did anybody even do a search for  
14 those words, regardless of whether it's for one policy  
15 or what it was for? Did anybody do a search for those  
16 words?

17 MS. WIXTED: Objection to form.

18 THE WITNESS: Yes.

19 MS. JONES: Go ahead, Julie, you can  
20 answer.

21 THE WITNESS: Yes.

22 MR. ABOUREZK: You talked over the top of  
23 her.

24 Q. (By Mr. Abourezk) Did somebody do a search  
25 for those terms, those words?

1 A. A search was requested.

2 Q. I'm sorry, I don't understand you. Did  
3 somebody do a search for the words "Alternative  
4 Payment Benefit Rider" or "Alternate Payment Benefit  
5 Rider"? Did someone do a search for those words?

6 MS. WIXTED: Objection to form.

7 THE WITNESS: Yes.

8 Q. (By Mr. Abourezk) Who? Who did the  
9 search?

10 A. I would need to confirm with Counsel on  
11 who was the actual person that performed that search.

12 Q. So you don't know as you sit here who did  
13 that search?

14 MS. WIXTED: Objection to form.

15 THE WITNESS: I don't know the name of the  
16 person that did that search, correct.

17 Q. (By Mr. Abourezk) Well, were you there  
18 when some person did that search?

19 A. No.

20 Q. And so did somebody show you the search  
21 results?

22 MS. JONES: Object to the form.

23 MS. WIXTED: Join in the objection.

24 MS. JONES: You can answer.

25 THE WITNESS: I didn't see the results, as

1 they would have gone to our counsel.

2 Q. (By Mr. Abourezk) I'm sorry, can you say  
3 that again and try to say it plainly, please?

4 A. I did not personally receive the results  
5 of it because it was at the request of Counsel. So  
6 the results would have gone to our counsel.

7 Q. Well, you say the results would have gone  
8 to your counsel. Who would they have gone from? Who  
9 did the search?

10 MS. WIXTED: Objection to form.

11 MR. ABOUREZK: And can I ask: What's  
12 wrong with the form? I said, "Who did the search?"

13 MS. WIXTED: She asked and answered that  
14 already. She said she would need -- she didn't know  
15 the person who had done the search individually.

16 Q. (By Mr. Abourezk) Do you know like how  
17 many options there are for the people that did the  
18 search?

19 Are there three or four different people that  
20 might have done it or just one or two?

21 A. It would have gone to our IT department,  
22 but I don't know the specific team that would have  
23 handled the request.

24 Q. Okay. So you didn't see any search  
25 results, correct?

1 MS. WIXTED: Objection to form.

2 Q. (By Mr. Abourezk) Correct?

3 A. Correct.

4 Q. And you don't know if it returned any hits  
5 or not, correct?

6 MS. JONES: Object to form. She already  
7 answered that.

8 Go ahead, Julie.

9 THE WITNESS: Based on our response, we  
10 said that there were no responsive documents.

11 Q. (By Mr. Abourezk) Well, you know that the  
12 words "Alternate Payment Benefit Rider" show up in  
13 Robert King's claim file. You know that, don't you?

14 MS. WIXTED: Object to the form.

15 MS. JONES: I'm going to object to the  
16 form.

17 But go ahead, Julie, you can answer if you  
18 know.

19 THE WITNESS: I haven't looked at every  
20 document so I can't confirm with certainty that that  
21 is in there.

22 Q. (By Mr. Abourezk) Well, if there were 111  
23 claims paid under the Alternate Plan Benefit Rider, it  
24 would be necessarily impossible for the word  
25 "Alternate Payment Rider" to never show up in any

1 policy -- in any claim files, would it?

2 MS. WIXTED: Objection to form.

3 MS. JONES: Objection to form. Sorry,  
4 Nicole. Both of us have objected to form.

5 MS. WIXTED: I know.

6 Do you want to -- you have a question  
7 pending so I don't want to do this now. I can wait  
8 till after. But we might be able to just agree that  
9 if one of us objects, the other one -- you know, it  
10 applies to all so we don't interrupt Mike's  
11 questioning.

12 MS. JONES: I would agree to that, Nicole.  
13 I think it will be easier for Mike as well and the  
14 court reporter.

15 MR. ABOUREZK: Yeah, that's fine.

16 THE WITNESS: And can you repeat the  
17 question? I'm sorry.

18 MR. ABOUREZK: Yeah. Would you read it  
19 back, please?

20 (The record was read back by the court  
21 reporter:

22 "QUESTION: If there were claims paid  
23 under the Alternate Payment Benefit Rider" --

24 COURT REPORTER: I just lost my screen.

25 MR. ABOUREZK: Strike that. Strike that.

1 I'll rephrase it.

2 BY MR. ABOUREZK:

3 Q. Are you aware, that according to your  
4 answers to interrogatories, there were 111 claims that  
5 were paid?

6 A. Yes.

7 Q. And that's under the Alternate Payment  
8 Benefit Rider, correct?

9 A. Yes.

10 Q. Okay. Now, how did you find out that 111  
11 claims are paid under the Alternate Payment Benefit  
12 Rider?

13 MS. WIXTED: Objection to form.

14 THE WITNESS: So earlier I mentioned a  
15 system called "LifePRO" which is where we make our  
16 payments. So if a claim is filed, it would have a  
17 record within the LifePRO administration system. And  
18 then when it's approved and we start paying benefits  
19 on it, it will actually create a transaction for every  
20 payment that you make.

21 And when you make that payment, you can  
22 associate it with a benefit code. And so Alternate  
23 Payment Benefit is a benefit code. So if somebody's  
24 been approved and paid under that benefit, we can  
25 identify it.

1           **Q.        (By Mr. Abourezk) And, in fact, if we look**  
2 **at the claim file here and look at CGIC 207, do you**  
3 **see what I'm talking about? Do you see an explanation**  
4 **of benefits here?**

5           A.        I do but I cannot read it. I see the form  
6 that is "Explanation of Benefits," though.

7           **Q.        (Zooming in.)**

8           A.        Thank you.

9           **Q.        Okay. Do you see this is CGIC 207?**

10          A.        You need to zoom back in again -- there  
11 you go.

12          **Q.        This is part of the OnBase system?**

13          A.        Yes and no. That's an explanation of  
14 benefits so it gets generated outside of OnBase, but  
15 because it's a copy of a file associated with the  
16 policy, an image of it gets copied into OnBase, but it  
17 doesn't generate that.

18          **Q.        Is this in the LifePRO system?**

19          A.        LifePRO will generate the transaction and  
20 the payment, or if there was a rejection, it would  
21 have that as well. That's the underlying data, but  
22 then that feeds a system that would then create an  
23 explanation of benefits. The LifePRO itself also does  
24 not create that.

25          **Q.        If we see here, we've got a code here in**

1 this document "Alt Pay Rider," correct?

2 A. Correct.

3 MS. JONES: Object to the form.

4 Sorry, Julie.

5 Object to the form, but she answered.

6 THE WITNESS: Correct.

7 Q. (By Mr. Abourezk) That's correct. And you  
8 can search the system for this code "Alt Pay Rider"  
9 and it will bring up all the times when a payment was  
10 made under that rider, correct?

11 MS. WIXTED: Objection to form.

12 MS. JONES: Objection to form.

13 Q. (By Mr. Abourezk) Is that correct?

14 A. Yes. It's a little different. I can't  
15 actually search the word "Alt Pay Rider." It's in a  
16 code that translates to "Alt Pay Rider," but, yes.

17 Q. Okay. I didn't understand what you said  
18 because I couldn't hear it quite well. The code, is  
19 the code "Alt Pay Rider"?

20 A. So the "Alt Pay Rider" is the description  
21 and it has a benefit code that's usually a three-digit  
22 benefit -- or three-character benefit code that would  
23 be in the claims system within LifePRO, some of the  
24 claims table that we would be able to search.

25 So, yes, we would be able to search it if it had

1 been paid under that.

2 Q. So with these 111 claims, going back to  
3 Exhibit A, with these hundred exhibit claims that you  
4 said were paid under the Alt Pay Rider, you know the  
5 names of the people that those claims were paid for,  
6 correct?

7 A. Yes.

8 Q. And you can go right into each one of  
9 those claims, can't you?

10 MS. JONES: Object to form.

11 But, Julie, you can answer.

12 THE WITNESS: We have claim files for each  
13 of our claimants so, yes.

14 Q. (By Mr. Abourezk) Now, if we go to  
15 "Defendants' Supplemental Responses to Plaintiff's  
16 Third Set of Requests for Production of Documents" and  
17 go to Request No. 10, can you read that here? I have  
18 it in front of us.

19 A. Can you scroll and make it just a little  
20 bit bigger?

21 Q. (Complying.)

22 A. Thank you.

23 Q. Do you see Request 10 --

24 A. Yes.

25 Q. -- "all documents relating to the

1 implementation of the Alternate Payment Benefit  
2 Rider."

3 And your answer was: There are no documents  
4 relating to the implementation of the Alternate  
5 Payment Benefit Rider. Correct?

6 MS. JONES: I'm going to object to the  
7 form. That's actually not what that says.

8 But go ahead, Julie. You can answer.

9 THE WITNESS: The documents were produced  
10 as part of the claims manual, so we did provide that.

11 Q. (By Mr. Abourezk) Well, there's nothing in  
12 the claim manual about the Alternate Payment Benefit  
13 Rider, is there?

14 MS. JONES: Object to the form of the  
15 question.

16 You can answer.

17 THE WITNESS: I would need to go review  
18 the claim manual to confirm.

19 Q. (By Mr. Abourezk) Well, you just got done  
20 saying, though, you just tried to tell me that that's  
21 in the claim manual and that was produced. But as you  
22 sit here, you don't know, there's nothing in the claim  
23 manual about the Alternate Payment Benefit Rider, is  
24 there? Do you know?

25 MS. JONES: I'm going to object to the

1 form, object to the form of the question. She already  
2 answered it.

3 But go ahead.

4 **Q. (By Mr. Abourezk) Do you know?**

5 A. I would need to go back and review the  
6 claim manual. I'm not familiar -- I did not memorize  
7 the claim manual and I didn't attest that I was an  
8 expert in claim manual, so I would want to go back and  
9 review it to see what it says in there.

10 **Q. Well, here is the claim manual. Do you**  
11 **see it in front of you? It's numbered CGIC 241.**

12 MS. JONES: I'm going to object. The  
13 claim manual is not in your deposition notice. If you  
14 want to ask her questions about a 126-page document,  
15 she's going to need some time to review that.

16 **Q. (By Mr. Abourezk) Well, here's the table**  
17 **of contents. Can you show me anyplace where it says**  
18 **anything about the Alternate Payment Benefit Rider in**  
19 **this document?**

20 MS. WIXTED: Same objection.

21 MS. JONES: I'm still going to object.  
22 And just because it's not in the table of contents  
23 doesn't mean it might not be somewhere else in the 126  
24 pages.

25 And like you doing a word search right now

1 on your computer is not appropriate for the  
2 deposition. You can do that, if you want to go ahead  
3 and do that, on your own time, you can. But that's  
4 not, that's not evidence appropriate for a deposition.  
5 So I'm going to lodge an objection to that.

6 MR. ABOUREZK: Yeah. Can I ask a  
7 question?

8 MS. JONES: Yeah. I'm done speaking, go  
9 ahead.

10 Q. (By Mr. Abourezk) Okay. My question is,  
11 No. 1, can you point to any anyplace in this claim  
12 manual where it even mentions the words "Alternate  
13 Payment Benefit Rider"?

14 MS. WIXTED: Again, I'm going to object;  
15 outside the scope of the deposition.

16 Q. (By Mr. Abourezk) Go ahead.

17 MS. JONES: You can answer if you can,  
18 Julie.

19 THE WITNESS: I would need to review the  
20 document. I'm not familiar with every page of the  
21 document.

22 Q. (By Mr. Abourezk) Well, I'm going to do a  
23 -- I just did a word search for "alternate payment  
24 benefit" and that doesn't show up in this document.  
25 Are you disputing that word search?

1 MS. JONES: I'm going to lodge an  
2 objection. Again, your word search during this  
3 deposition is not an appropriate use of evidence. If  
4 Julie wants to review the entire document, she can do  
5 so on her own.

6 I don't know what you're doing or trust it  
7 so, therefore, objection lodged.

8 MR. ABOUREZK: Okay. You're --

9 MS. JONES: Go ahead, Julie, you can  
10 answer if you can.

11 THE WITNESS: Can you repeat the question?

12 **Q. (By Mr. Abourezk) Yeah. Are you denying,**  
13 **are you denying that the word search produces nothing**  
14 **when I search for "alternate payment benefit" in this**  
15 **document?**

16 MS. JONES: Objection -- go ahead, Mike,  
17 sorry. Same objection.

18 Julie, you can try to answer.

19 THE WITNESS: Yeah, I feel like I still  
20 have the same answer. I'm not able to look at every  
21 page of the document or search it or know what's in it  
22 based on your searches right now.

23 **Q. (By Mr. Abourezk) Well, but you're willing**  
24 **to testify, as you did just a minute ago, that the**  
25 **documents that were responsive to that document**

1 request is the claim procedure manual as part of the  
2 documents that were produced.

3 Are you still claiming that or are you going to  
4 retract that?

5 MS. JONES: I'm going to object to the  
6 form of the question. She was simply reading the  
7 response that was written.

8 Julie, you can try and answer his question  
9 if it makes sense to you.

10 THE WITNESS: I would say we provide it as  
11 a responsive document for the claims manual.

12 Q. (By Mr. Abourezk) Okay. Well, let's look,  
13 then, back at Request No. 11:

14 "All documents concerning the  
15 interpretation, application, or scope of the Alternate  
16 Payment Benefit Rider."

17 You would agree with me, wouldn't you, that your  
18 company is handling over 5,000 policies that have this  
19 rider in it, correct?

20 MS. WIXTED: Object.

21 MS. JONES: Object to the form, but you  
22 can answer.

23 THE WITNESS: I would want to reference  
24 the table that was above with the policies just to  
25 confirm the number, but we are handling policies with

1 this rider, yes.

2 Q. (By Mr. Abourezk) Over 5,000 policies  
3 containing the Alternate Payment Benefit Rider,  
4 correct, over 5,000?

5 A. Yes, as of December 2023.

6 Q. But what you're saying is there is no --  
7 your company has no documents that describe how that  
8 rider is interpreted or applied?

9 MS. WIXTED: Objection form.

10 MS. JONES: Objection, yeah.

11 You can try to answer, Julie.

12 Q. (By Mr. Abourezk) Is that what you're  
13 saying?

14 A. We have the claims manual and we have the  
15 policy itself.

16 Q. Okay. Now, the claim manual, we already  
17 talked about that and we can go through it page by  
18 page, but so what you're saying is other than what's  
19 in the policy and what you say is in the claim manual,  
20 there's no other documents telling claim people how to  
21 apply this rider?

22 MS. JONES: Object to the form of the  
23 question.

24 Julie, you can try and answer.

25 THE WITNESS: We provided what documents

1 were responsive to the request.

2 Q. (By Mr. Abourezk) And there are no  
3 documents. Your company has no documents explaining  
4 how this is supposed to be interpreted or implied. Is  
5 that what you're saying?

6 MS. JONES: Object to form; asked and  
7 answered.

8 Go ahead, Julie, you can try and respond.

9 THE WITNESS: Again, we've provided what  
10 responsive documents that we had.

11 Q. (By Mr. Abourezk) And that is the policy  
12 and the claim manual. Is that what you're saying?

13 MS. JONES: Object to form.

14 Go ahead, Julie, you can try and answer.

15 THE WITNESS: Based on what we provided,  
16 we gave you what was responsive.

17 Q. (By Mr. Abourezk) Now, I want to know, I  
18 want to know exactly what you're saying is responsive.  
19 You said the policy and the claim manual; is that  
20 right?

21 MS. JONES: I'm going to object. You're  
22 being argumentative, Mike. She already answered the  
23 question three times.

24 You can try and answer again, Julie.

25 Q. (By Mr. Abourezk) No, I've got to pin this

1 down. Is that what you're saying is responsive?

2 MS. JONES: Well, you can read, you can  
3 read the response that I wrote and that is responsive,  
4 and then she can answer as to what I wrote. That's  
5 what you're --

6 MR. ABOUREZK: No, I need to have her test  
7 -- Sandy, you need to stop testifying.

8 MS. JONES: No, I don't. I'm objecting --

9 MR. ABOUREZK: Stop testifying.

10 MS. JONES: -- because your questions are  
11 beyond the scope of the notice that you issued, Mike.

12 MR. ABOUREZK: Stop testifying.

13 MS. JONES: I'm not testifying, I'm  
14 objecting that your questions are beyond the scope of  
15 the notice that you issued, Mike. She's answered the  
16 question.

17 Q. (By Mr. Abourezk) Is there any --

18 MS. JONES: She can answer.

19 Q. (By Mr. Abourezk) Is there anything else  
20 that you're claiming is responsive to Request No. 11  
21 other than the policy and the claim manual?

22 A. I have no --

23 MS. JONES: Same objection.

24 You can answer. Go ahead. Sorry, Julie.

25 A. -- no further responsive documents other

1 than what we provided.

2 MR. ABOUREZK: Court reporter, would you  
3 read that back, that answer back to me, please?

4 (The record was read by the court reporter  
5 as follows:

6 "ANSWER: No further responsive documents  
7 other than what we provided.")

8 BY MR. ABOUREZK:

9 Q. Okay. That's not an answer to my  
10 question. My question is: Are you saying there's any  
11 responsive documents other than the policy and the  
12 claim manual?

13 MS. JONES: I object that that -- isn't  
14 that a direct response? She said, "No further  
15 responsive documents."

16 Q. (By Mr. Abourezk) Answer, please.

17 A. I agree with Sandy. I don't understand  
18 the question and what's different about your wording.

19 Q. I'm just trying to get a black-and-white  
20 answer. Are you saying that there are no responsive  
21 documents to Request No. 11 other than the policy and  
22 the claim manual?

23 MS. WIXTED: Objection to form; asked and  
24 answered.

25 THE WITNESS: Yes, we have no responsive

1 documents besides the claim manual and the policy.

2 Q. (By Mr. Abourezk) Thank you. Now, in  
3 Request No. 12 of this, Request No. 12 of Defendants'  
4 Supplemental Responses to Plaintiff's Third Request  
5 for Production, asks for: All documents supporting  
6 Defendants' claim that the Alternate Payment Benefit  
7 Rider does not provide benefits when a family member  
8 provides assistance with ADLs.

9 And your answer is here. Would you like to  
10 review it?

11 A. Yes.

12 Q. You can tell me when you want to turn the  
13 page.

14 A. (Perusing document) -- and I'm good for  
15 the next page. (Perusing document) -- okay.

16 Q. Okay. Do you see here where it says:  
17 "Continental has argued, in defending this lawsuit,  
18 that Plaintiff was a family member of the insureds,  
19 and so she was paid pursuant to the terms of the  
20 Rider"?

21 Do you see that?

22 A. Yes.

23 Q. And does that mean that Continental  
24 recognizes there is no family member exclusion that  
25 applies to the Alternate Payment Benefit Rider?

1 MS. JONES: I'm going to object to the  
2 form of the question.

3 Julie, you can try and answer.

4 THE WITNESS: We do -- the alternate  
5 payment benefit does not exclude family members from  
6 providing care.

7 Q. (By Mr. Abourezk) And has Continental ever  
8 taken the position that it did exclude family members?

9 MS. WIXTED: Objection to form.

10 MS. JONES: Objection to form.

11 Go ahead, Julie.

12 THE WITNESS: No.

13 Q. (By Mr. Abourezk) And if that is the case,  
14 those 111 claim files where Continental has made some  
15 payment under the family -- or under the Alternate  
16 Payment Benefit Rider, those 111 files would help us  
17 understand whether Continental has ever told people  
18 there's a family member exclusion that applies to this  
19 Alternate Payment Benefit Rider; is that correct?

20 MS. JONES: I'm going to object to the  
21 form of the question; calls for speculation.

22 Julie, you can try and answer.

23 THE WITNESS: Can you repeat your question  
24 again?

25 Q. (By Mr. Abourezk) Yeah. If we wanted to

1 find out whether Continental has traditionally told  
2 people they can't get benefits under the Alternate  
3 Payment Benefit Rider if they're getting help from a  
4 family member, if we wanted to find that out, one of  
5 the ways we'd do that is by looking at those 111 claim  
6 files where some sort of a payment was made under the  
7 Alternate Payment Benefit Rider; is that correct?

8 MS. JONES: Same objection.

9 Julie, you can try and answer.

10 THE WITNESS: You could look at the 111  
11 files, but I don't know that it's going to tell you  
12 anything beyond Continental approved them for benefits  
13 and paid them under the Alternate Payment Benefit  
14 Rider.

15 Q. (By Mr. Abourezk) Well, if someone told  
16 the policyholder, "You can't get benefits if a family  
17 member has given you the assistance," that should show  
18 up in the claim file, shouldn't it?

19 MS. JONES: Object to the form of the  
20 question; calls for speculation.

21 Julie, you can try and answer.

22 THE WITNESS: If someone called in, it  
23 would be documented in the claim file what took place  
24 in that conversation and it would have to be about  
25 each of the individual benefits on the policy of

1 whether or not a family member is excluded or not.

2 Q. (By Mr. Abourezk) And so by looking at  
3 those individual 111 claim files, we can get an idea  
4 of what it is that Continental tells people about the  
5 Alternate Payment Benefit Rider, correct?

6 MS. JONES: Objection; same, same  
7 objection.

8 You already answered the question but,  
9 Julie, you can try and answer again.

10 THE WITNESS: You, by looking at the 111,  
11 you would get a feel for people asking potentially for  
12 alternate payment benefit or, generally, about filing  
13 a claim on their policy.

14 Q. (By Mr. Abourezk) Well, are you familiar  
15 with what the requirements are for a claim file, what  
16 is supposed to be maintained in a claim file?

17 MS. WIXTED: Objection to form; beyond the  
18 scope.

19 MS. JONES: Julie, you can try and answer.

20 Q. (By Mr. Abourezk) Go ahead.

21 A. I was not in the claims department during  
22 the time of this policy so I don't know what the  
23 requirements would have been at that time.

24 Q. Do you know what the requirements are  
25 today?

1 MS. JONES: Same objection.

2 Julie, you can try and answer.

3 THE WITNESS: No, because again, I'm not  
4 in the claims department at this moment.

5 Q. (By Mr. Abourezk) And if you did a word  
6 search, if you did a word search of those 111 files,  
7 you could find out whether the word "family members,"  
8 is being used in that file, couldn't you?

9 MS. JONES: Again, I object to the form of  
10 the question. It's already been asked.

11 Go ahead, Julie, you can try and answer.

12 THE WITNESS: I could search in each  
13 individual claim file for a given word "family," but  
14 it would also have to be reviewed to see the context  
15 of what that word was used in.

16 Q. (By Mr. Abourezk) Well, so in other words,  
17 you could, you admit that you can identify documents  
18 in each of those 111 files that contain the word  
19 "family," correct?

20 MS. JONES: Object to the form.

21 Julie, you can try and answer.

22 THE WITNESS: I said within the claim file  
23 I could search that, but I wouldn't be able to search  
24 every document, as you mentioned, that's associated  
25 with that policy. So we get claim documents; I

1 wouldn't be able to research all of those,  
2 necessarily. But in a claim file itself, on an  
3 individual basis, we can search for a word.

4 Q. (By Mr. Abourezk) And that wasn't done.  
5 You didn't search for the word "family" in any of  
6 those 111 files, did you?

7 MS. JONES: Object to the form of the  
8 question.

9 Julie, you can answer.

10 THE WITNESS: No.

11 Q. (By Mr. Abourezk) Well, you know that we  
12 issued a request here, it's Request No. 29, for  
13 Plaintiff's Fourth Set of Document Requests. And I'm  
14 going to look at Request No. 30.

15 We asked you to identify any documents from a  
16 claim file where the policy included the Alternate  
17 Payment Benefit Rider, the claim was paid, and the  
18 document includes the word "family."

19 Do you see that request?

20 A. Yes. Can you make it a little bit bigger,  
21 please?

22 Q. Sure. (Complying) -- do you see it?

23 A. Yes, thank you.

24 Q. But you're telling me that there was no  
25 search for the word "family" in any of those files.

**Is that what you're saying?**

MS. JONES: Object to form.

MS. WIXTED: Objection.

MS. JONES: You can try answer.

THE WITNESS: So on this request, you're talking about all documents in a claim file which is not just our internal claim notes. We can search our internal claim notes for the word "family," but we can't search every document associated with a claim file for the word "family."

MS. JONES: Beyond that, Mike, I have instructed my client not to search 111 claim files. I've told you that from the get-go. If you want to file a motion to compel us to do so, you can, but we did not, so if that helps your line of questioning here. Hopefully, that does it.

**Q. (By Mr. Abourezk) Yeah, I just want to nail it down. There was no effort to make this search in Request No. 30, correct?**

MS. JONES: At my instruction, that's construct.

And, Julie, you can answer if you want to make it clearer for Mike.

THE WITNESS: We did not search individual claim files for the word "family."

1 Q. (By Mr. Abourezk) Well, then, why does it  
2 say here in the Response to No. 30:

3 "Continental is not able to locate any  
4 responsive documents by performing a word search for  
5 the word 'family'?"

6 Are you saying that you can't perform a word  
7 search for the word "family"?

8 MS. JONES: Object to form. I've already  
9 explained this.

10 But go ahead, Julie, you can try and  
11 answer.

12 THE WITNESS: We can search the claim  
13 notes for the word "family" but not the documents  
14 themselves.

15 Q. (By Mr. Abourezk) Well, when you say you  
16 can't search the documents themselves, what if, what  
17 if Continental created a letter and put that in the  
18 claim file? That's a Word document, correct?

19 MS. JONES: Object to form; calls for  
20 total speculation.

21 Julie, you can answer if you know.

22 THE WITNESS: It, most likely, is a PDF,  
23 not a Word document itself. But, again, it's because  
24 I can only search the document type or the index  
25 values on it. I couldn't search the content of it

1 unless I opened each individual document associated  
2 with each individual file.

3 MR. DAVIS: Signing off, bye all.

4 MR. ABOUREZK: What was that?

5 MR. DAVIS: I said I'm leaving the  
6 meeting, Mike.

7 MR. ABOUREZK: Oh, okay.

8 MR. DAVIS: Thanks.

9 MR. ABOUREZK: Okay.

10 MS. JONES: Thanks, Max.

11 MR. DAVIS: You bet, guys.

12 MR. ABOUREZK: We come to the Answers to  
13 Defendants' Supplemental Responses to Plaintiff's  
14 Third Request for Production that are dated May 16,  
15 2024, and we do not have a signature.

16 Counsel, I couldn't find any, any signed  
17 version of this. Am I wrong?

18 MS. JONES: Off the top of my head, I  
19 don't know. I can look for it. If not, I'm happy to  
20 sign it. I think the little "S" probably denotes  
21 signature. But I send everything to Max to put  
22 through so perhaps it was missed somewhere, I don't  
23 know.

24 Q. (By Mr. Abourezk) Okay. And I'm asking  
25 the witness now: Can you confirm for me today, you're

1 looking at -- I don't know why that's still on there.

2 The copy that you were looking at, were they  
3 signed?

4 A. I'm not positive on that one, I don't  
5 know.

6 MS. JONES: Probably not, Mike, because we  
7 looked at your exhibit.

8 MR. ABOUREZK: Okay, then. Then why don't  
9 we --

10 MS. JONES: Aren't we all looking at the  
11 same thing?

12 MR. ABOUREZK: We have these on, we have  
13 these on May 16, 2004, that are not signed. Then we  
14 have the supplemental objections and responses to the  
15 first set of interrogatories dated May 23, 2024, that  
16 are not signed. Then we've got responses to the  
17 fourth set of requests for production. These do have  
18 a signature.

19 I guess what I want to do is confirm, and  
20 maybe you can do this, Sandy, I mean, are these true  
21 and correct answers or are you going to change them?

22 MS. JONES: I'm not going to -- I mean, if  
23 you have them, I'm assuming - I apologize, I have a  
24 barking dog - if you have them, I assume they're final  
25 but I can't, as I sit here, tell you that you have as

1 your exhibit what I produced. I'd have to look at  
2 them side-by-side.

3 I'm assuming that's correct. I can check  
4 that for you after the fact but I can't do that now.  
5 I mean, it's your exhibit, so you didn't ask me about  
6 it beforehand. I don't know.

7 MR. ABOUREZK: Okay. Let's take a break  
8 for a few minutes and I'll finish.

9 MS. WIXTED: Before the break, Mike, you  
10 had somebody come in behind you during the deposition.  
11 Can you tell us who that was and whether that person  
12 is still in the room?

13 MR. ABOUREZK: Yeah. Who's speaking?

14 MS. WIXTED: Nicole.

15 MR. ABOUREZK: My son, my son came in and  
16 sat down. He didn't know I was on a conference call.  
17 And he's gone.

18 MS. JONES: So how long do you want? Ten,  
19 we'll take ten minutes so Julie can use the restroom,  
20 and whatnot, since she's in the conference room.

21 VIDEOGRAPHER: The time is that 9:03 a.m.  
22 We're off the record.

23 (A brief recess was taken.)

24 VIDEOGRAPHER: The time is 9:13 a.m.  
25 We're on the record.

1 MS. JONES: Right. Once again, I just  
2 want to make sure my colleague Nicole is there.

3 Nicole, are you still there?

4 MS. WIXTED: I am here.

5 MS. JONES: Okay, great. Go ahead.  
6 Apologies, Mike.

7 MR. ABOUREZK: I don't have any further  
8 questions.

9 MS. JONES: Okay. So that ends your  
10 deposition.

11 VIDEOGRAPHER: Anybody else?

12 MS. JONES: No, I don't have any  
13 questions.

14 VIDEOGRAPHER: Okay. This concludes the  
15 Rule 30(b)(6) CGIC Videotaped of Julie Belknap.

16 The time is 9:13 a.m. We are off the  
17 record.

18 MR. ABOUREZK: Well, before you go off the  
19 record, one last thing.

20 VIDEOGRAPHER: Okay.

21 MR. ABOUREZK: Are we back on the record?

22 VIDEOGRAPHER: We're on the record.

23 MR. ABOUREZK: Okay. Yeah, I'm moving to  
24 sequester witnesses because I don't want contact  
25 between witnesses while these depositions are taking

1 place.

2 MS. JONES: I don't have any objection to  
3 that.

4 MR. ABOUREZK: Excuse me?

5 MS. JONES: I have no objection to that.

6 MR. ABOUREZK: Okay. That's all.

7 VIDEOGRAPHER: We're off the record.

8 (Signature reserved.)  
9

10 \* \* \* \* \*

1 STATE OF MONTANA )  
2 : ss.  
3 County of Silver Bow )

4 I, Candice L. Nordhagen, Court Reporter - Notary  
5 Public in and for the County of Silver Bow, State of  
6 Montana, do hereby certify:

7  
8 That the witness in the foregoing Videotaped  
9 30(b)(6) deposition, Julie Belknap, was by me first  
10 duly sworn according to law in the foregoing cause;  
11 that the deposition was then taken before me at the  
12 time and place herein named; that the deposition was  
13 reported by me in machine shorthand and later  
14 transcribed by computer, and that the foregoing  
15 fifty-one (51) pages contain a true record of the  
16 witness, all done to the best of my skill and ability.

17 IN WITNESS WHEREOF, I have hereunto set my hand  
18 and affixed my notarial seal this \_\_\_\_\_ day of  
19 \_\_\_\_\_, 2024.

20  
21 \_\_\_\_\_  
22 Candice L. Nordhagen  
23 Notary Public for the State of  
24 Montana residing at Butte,  
(NOTARIAL SEAL) expires October 26, 2024.

1 DEPOSITION OF: JULIE BELKNAP

2 DEPOSITION DATE: SEPTEMBER 11, 2024

3 IN RE: KING vs. CGIS, et al.

4 COURT REPORTER: CANDICE L. NORDHAGEN

5  
6 I have read my deposition and make the following  
7 corrections or additions:

8 PAGE LINE CORRECTION  
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22 Signed under penalty of perjury this 7 day  
23 of October, 2024.

24 Julie E. Belknap  
25 Julie Belknap

Page 53